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7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA
9

10 SAMUEL GALDAMEZ,

11 Plaintiff,

12 v.

13 UNITED STATES OF AMERICA,

14 Defendant.
15

CASE NO.: 2:20-cv-00152-KJM-AC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

16 The parties submit the following stipulation to extend the remaining discovery deadlines in
17 this matter by ninety (90) days. Pursuant to Fed. R. Civ. P. 16(b)(4), good cause exists to extend
18 these remaining deadlines because an extension will allow the parties to avoid unnecessary expenses
19 related to discovery and expert disclosures while the parties attempt to settle this matter. The parties
20 have contacted Magistrate Judge Claire's chambers to obtain available dates for a settlement
21 conference. Pursuant to Local Rule 144(b), the parties previously requested and obtained a ninety-
22 day extension of time of these deadlines on April 5, 2021.

23 The parties therefore respectfully request that the Court grant a ninety-day extension of time
24 of the remaining discovery deadlines.
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Accordingly, by and between the parties and subject to Court approval,

IT IS HEREBY STIPULATED that the following deadlines be extended by **ninety (90)** days:

Discovery matter	Original deadline	New deadline
Fact discovery cut-off	August 26, 2021	November 24, 2021
Expert disclosures	September 28, 2021	December 27, 2021
Rebuttal expert disclosures	October 28, 2021	January 26, 2022
Expert discovery cut-off	November 25, 2021	February 23, 2022
Dispositive motions heard	December 17, 2021	March 18, 2022

Dated: August 23, 2021

PHILLIP A. TALBERT
Acting United States Attorney

By: /s/ W. Dean Carter
W. DEAN CARTER
Assistant United States Attorney

Attorneys for Defendant
United States of America

Dated: August 23, 2021

STAWICKI ANDERSON & SINCLAIR

By: /s/ Nicholas Anderson
Nicholas Anderson

Attorneys for Plaintiff
Samuel Galdamez

ORDER

The court **grants** the stipulation as outlined, except dispositive motions will be heard on March 25, 2022 as March 18, 2022 is not an available civil law and motion date. **IT IS SO ORDERED.**

DATED: August 24, 2021.


CHIEF UNITED STATES DISTRICT JUDGE

STIPULATION AND ORDER